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November 20, 2023

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Hon. Lois H. Goodman, U.S.M.J.
U.S. Court House
50 Walnut Street
Newark, NJ 07102

Re: U.S. v. Roosevelt Care Centers
Docket No.: 3:23-cv-01529-GC-LHG

Dear Judge Goodman,

As Your Honor may recall, the undersigned represents Defendant Roosevelt Care Centers, Inc., in the above matter. On behalf myself and my adversary, Asst. U.S. Attorney Thandiwe Boylan, Esq., kindly allow this to serve as a brief update on settlement.

The parties have largely agreed in principal and are currently working out the details. The former employee has agreed to the \$50,000 demanded and Plaintiff has provided a proposed Consent Decree to which Defendant has requested some minor revisions. We have also provided Plaintiff with a copy of Middlesex County's Human Resources Policy for review, as requested. Please note, however, that we will need some additional time in order to bring this matter to a conclusion.

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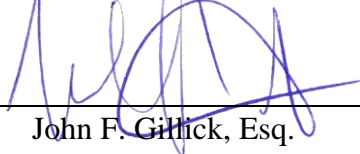
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Your Honor's time and consideration in this regard are greatly appreciated. Should the Court have any questions or should additional information be needed, please do not hesitate to contact me at your convenience.

Very truly yours,

RAINONE COUGHLIN MINCHELLO, LLC

By:  _____
John F. Gillick, Esq.

JFG/me

cc: Thandiwe Boylan, Esq.